

**EXHIBIT**  
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October 27, 2023

*Delivery Via Electronic Mail Only*

Chris Swope  
Lansing City Clerk  
City Hall  
124 W Michigan Avenue  
Lansing, MI 48933  
Email: [city.clerk@lansingmi.gov](mailto:city.clerk@lansingmi.gov)

Re: Your violation of my clients' First Amendment rights

Dear Mr. Swope:

I represent Merica20toLife regarding the "cease and desist" letter you sent to Michael and Erica Lynn on October 25, 2023, attached. In this letter, you, a City of Lansing elected official, violated the First Amendment to the U.S. Constitution by attempting to silence my clients' free speech. I was shocked but, honestly, secretly pleased to see you making absurd legal threats in the letter; most people in positions like yours wisely leave the lawyering to the lawyers so that people like me who try to find reasons to sue governments as a hobby don't have any extra ammunition.

I am attaching a letter sent from the ACLU of Michigan to the City of Ann Arbor in 2018 on the question of whether government bodies may enact or enforce ordinances which limit citizens' use of governmental seals. As the ACLU details far better than I could, such actions are a clear First Amendment violation; further, the City of Lansing ordinance upon which you rely in your letter is unlawful. Given that your most recent post on X, attached, is a retweet of an ACLU national post emphasizing the importance of the First Amendment, I assume you respect and will comply with the ACLU's legal analysis.

I therefore write to demand that you cease and desist from demanding that my clients cease and desist from exercising their constitutionally protected free speech rights. Should you continue to pursue this course of action, I will relish the opportunity to file an absolute slam dunk of a First Amendment lawsuit against the City of Lansing on Merica20toLife's behalf.

Very truly yours,  
ABDNOUR WEIKER, L.L.P.

*/s/ Elizabeth K. Abdour*

Attachments

cc: Jim Smiertka ([CityAtty@lansingmi.gov](mailto:CityAtty@lansingmi.gov))  
Michael and Erica Lynn ([merica20tolife@gmail.com](mailto:merica20tolife@gmail.com))  
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